



**MONTANA OUTFITTERS & GUIDES ASSOCIATION**  
2021 11<sup>TH</sup> AVE SUITE 12 HELENA, MT 59601

September 19<sup>th</sup>, 2024

MT Fish, Wildlife & Parks Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Mt 59620-0701

**Subject: Support for Proposed 2025-2026 Fishing Regulations**

Dear Members of the Fish, Wildlife, and Parks Commission,

I am writing on behalf of the Montana Outfitters and Guides Association (MOGA), representing over 500 members who are deeply invested in the health and sustainability of Montana's fisheries. We appreciate the opportunity to comment on the proposed fishing regulations for the 2025-2026 period.

MOGA supports the adoption of the 48 regulation changes proposed by FWP, along with the consideration of the five public proposals. MOGA recommends the adoption of a commissioner-initiated amendment for lake whitefish, and we recommend an amendment to Proposal 1, as described below. These changes reflect a thoughtful balance between conservation needs, public input, and the economic interests of our industry.

**Support for Specific Changes:**

- **Flathead Lake Whitefish Limits:** We endorse Commissioner Tabor's proposal to revert the whitefish catch limits on Flathead Lake to the standard district limits of 20 fish per day and 40 in possession. This amendment aligns with the broader management goals for the region, ensuring sustainability of commercial fishing on Flathead Lake.

**MOGA Recommended Amendment:**

- **Proposal 1 - "Definition of a Hook":** MOGA recommends the complete removal of the statement that "A lure with multiple hooks is considered a single hook." This amendment aims to reduce the use of gear on rivers and streams across the state, which could decrease the occurrence of hooked and scarred fish, as well as fish mortality. Currently, state regulations permit anglers to use up to two hooks on a single line. If Proposal 1 remains unchanged, it would permit the use of two lures on one line, each potentially equipped with multiple hooks, or two articulated flies, each with multiple hooks. MOGA contends that such gear, which places numerous hooks near fish during angling, can be particularly detrimental to our fisheries, especially affecting native and wild salmonids. This concern is heightened in areas where treble hooks are allowed. By removing this line, the Commission would not restrict fishing opportunities but would merely limit the number of hooks that can be used in proximity to fish during angling. We suggest that

post-implementation, the effectiveness of this change be monitored through annual fish health assessments.

**Public Involvement:**

The public involvement process, which includes a comment period from August 21 through September 19 and regional public meetings, exemplifies the Commission's commitment to transparency and community engagement. This inclusive approach has provided stakeholders like us with a platform to express our concerns and support for these regulations, ensuring that the final decisions reflect a broad consensus.

**Economic and Watershed Ecosystem Considerations:**

The proposed regulations are designed not only to safeguard fish populations but also to bolster the economic health of hundreds of fishing-related small businesses and support thousands of seasonal jobs. These jobs, in turn, stimulate rural economies through the "multiplier effect," impacting sectors like retail, gas, food, and lodging. Sustainable fishing practices are essential for maintaining the long-term health of our watersheds, which is fundamental to our industry's ability to offer quality fishing experiences and fulfill an essential public service.

**Recommendation:**

We urge the Commission to adopt the proposed regulations as outlined by FWP, including the public proposals, and specifically endorse the amendment to the Flathead Lake whitefish limits. Furthermore, MOGA recommends the removal of the language from Proposal 1 concerning the definition of a hook, as previously detailed. These measures will ensure that our fisheries remain vibrant, supporting both ecological integrity and economic sustainability.

Thank you for considering our support for these crucial regulations. We look forward to ongoing collaboration with FWP to manage our state's natural resources responsibly. We would also welcome the opportunity to discuss these recommendations in more detail at your convenience.

Sincerely,



Will Israel  
Executive Director  
Montana Outfitters & Guides Association